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**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

THE HOME DEPOT, INC., ET AL.,

Plaintiffs,

v.

STEADFAST INSURANCE CO., ET AL.,

Defendants.

Civil Action No. 1:21-cv-00242

District Judge Susan J. Dlott

Magistrate Judge Stephanie Bowman

**SECOND DECLARATION OF  
MICHAEL BAUMRIND IN  
SUPPORT OF PLAINTIFFS'  
MOTION FOR PARTIAL  
SUMMARY JUDGMENT**

I, Michael Baumrind, hereby declare:

1. I am an attorney-at-law of the State of Georgia and an associate at the law firm of Bondurant, Mixson & Elmore, LLP, attorneys for Plaintiffs in the above-captioned matter.

2. The documents attached hereto as Exhibits A and B are true and correct copies of public filings in *Target Corp. v. ACE American Insurance Co.*, No. 19-CV-2916 (WMW/DTS), 2022 WL 848095 (D. Minn. Mar. 22, 2022), *motion to certify appeal denied*, No. 19-CV-2916 (WMW/DTS), 2022 WL 4592094 (D. Minn. Sept. 30, 2022), downloaded directly from PACER.

3. The document attached hereto as Exhibit C is a true and correct copy of a public filing in *Camp's Grocery, Inc. v. State Farm Fire & Casualty Co.*, No. 4:16-CV-0204-JEO, 2016 WL 6217161, at \*2 (N.D. Ala. Oct. 25, 2016), also downloaded directly from PACER.

*Signature follows on the next page.*

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and this this declaration was executed in Fulton County, Georgia on November 18, 2022.

/s/ Michael R. Baumrind

Michael R. Baumrind